

Cable Advisory Committee
Town of Amherst
4 Boltwood Avenue
Amherst, MA 01002

July 14, 2006

Ms. Andrea Nixon, Clerk
Cable Television Division
One South Station
Boston, Massachusetts 02110
BY MAIL AND E-MAIL

Re: CTV 06-1 – Petition of Verizon New England, Inc.

Dear Ms. Nixon:

The Town of Amherst Cable Advisory Committee expresses its strong opposition to Verizon of New England's proposed amendments to the Cable Division's regulations regarding cable franchising for "competitive" licenses. Having been directly involved in the cable renewal licensing process for the thirty (30) month or more period, outlined in Section 626 of the Cable Act, we are well aware of the myriad of issues involved in cable licensing and the significant amount of time needed to complete the process and protect the public interest. Verizon's proposal, among other things, attempts to:

- (i) eliminate the Issuing Authority Report – a critical part of the licensing process;
- (ii) unreasonably reduce the period of time prior to a hearing to assess the applicant's proposal and qualifications; identify cable-related needs and interests, negotiate the many cable license provisions, financial and otherwise; and draft and revise the license document (a 35 to 75 page document), to a period of sixty (60) days; and
- (iii) reduce the time in which the licensing authority has, after the hearing, to complete the tasks the post-hear review and tasks, to thirty (30) days.

Rather than being a serious proposal to address and update the Cable Division's regulations, Verizon New England, Inc. proposal is clearly an attempt to circumvent local franchising and the reasonable obligations that communities have long reasonably applied to cable operators – both initial licenses and competitive licenses (such as RCN) in the Commonwealth.

The Cable Division should reject the subject petition of Verizon of New England. There is no evidence that in those limited parts of the Commonwealth where Verizon has applied for a cable license, that municipalities have been unreasonable, nor is there any evidence that eliminating the time needed to properly complete the above referenced tasks in the licensing process will improve the process, much less the result of that process. In fact, there is good reason to believe that Verizon's attempt to effectively remove cities and towns from the initial cable licensing process will delay, rather than expedite licensing and the entry of competition, and lead to unnecessary and costs appeals and litigation. This is a result that no one should seek or support.

Finally, on behalf of the Town of Amherst we would welcome an application from Verizon to provide cable service in the Town of Amherst.

/s/ William C. Venman
Chair, Cable Advisory Committee

cc Select Board, Town Manager